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**VIA EMAIL ONLY**  
June 14, 2022

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Re: *Stirling v. Hendrix*  
Case No. 3:20-cv-00712-SB

Dear Amy and Alison:

As you know, Judge Beckerman suggested that we continue the practice of alerting the USAO to urgent medical needs of inmates, so that these could be addressed case-by-case. Although we could not independently verify these needs that are being reported to us by inmates, they ring true, and I hope that you can arrange to have medical staff at Sheridan respond quickly. I have included the list of inmates from the former request that we made, with their updated concerns marked in bold italics.

**Inmates Report Immediate Attention Needed, as of June 1, 2022:**

[REDACTED] Has requested to see medical due to chest and side pain, as well as a burning and tingling sensation. The pain is now beginning to radiate down his legs. He states he is also swollen on his right side.

[REDACTED] Needs to see the dentist.

[REDACTED] Has a hernia the size of a basketball that needs attention.

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[REDACTED] He is only receiving two of his three insulin shots a day.

[REDACTED] He fell and broke his arm on February 18. His arm has not healed and he has not had follow up medical.

[REDACTED] He needs to see the dentist regarding the abscess at the bottom right part of his mouth causing extreme pain.

[REDACTED] Inmate reports he came in with ruptured ligaments in left ankle and letters from ortho surgeon and has not been seen. He states he also has degenerative Aortic Stenosis and is getting close to being due for open heart surgery, although he has yet to be seen by a Cardiologist or to have the echo required to gauge his heart. He has lesions in his brain that meet diagnostic standards for M.S., the largest being 7mm. He was in the middle of diagnosis when he turned himself in.

[REDACTED] Needs HEP C treatment.

[REDACTED] He has unmanaged pain from severe knee arthritis and former shoulder injury exacerbated by a fall in January 2021. When Mr. [REDACTED] fell and injured his shoulder, an EMT at BOP Health Services did a visual exam and did not notice anything that looked wrong. He then told him to use RICE (rest, ice, compression, elevation). Mr. [REDACTED] should have had his shoulder examined appropriately (not just with the eyes) by a clinician for evidence of a tear or other serious injury. His 2019 left shoulder MRI already showed a significant tear in the shoulder and this injury may have caused further damage. A repeat MRI of the left shoulder and a visit to an orthopedist seem appropriate.

[REDACTED] Mr. [REDACTED] has been suffering from a tooth infection that is very painful for the last 8-9 months. He also has fillings that are loose and have come out. He has sought medical attention but has not received any assistance.

[REDACTED] He has numerous medical needs for his pre-existing health conditions which include hypertension, hematochezia, peptic ulcer disease, and iron deficiency anemia. His current blood cell count has been dropping and he has experienced bleeding in his stool and stomach pains. His stomach pains have been so severe recently that there have been times when he has not been able to stand up. He also has a large mass on his thigh that probably needs to be biopsied to make sure it is not cancerous.

[REDACTED] Victorville prison ordered endoscope and was re-ordered once arriving at Sheridan. It has been over six months and inmate complains of pain in his intestine and rectum.

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[REDACTED] Needs dental care.

[REDACTED] Needs dental care.

**This following list – previously provided on March 25, 2022 – has updates added in bold. If the inmate has moved or was released, we have removed them from this list.**

- [REDACTED] He is supposed to be taking Warfarin (anti-coagulant) for his AFIB prior to surgery. It is a life saving medication used to prevent stroke prior to surgery. He also needs frequent blood tests. **(He had heart surgery at Adventist Hospital but is still struggling with his heart issues and has not had a follow up appointment with surgeon as directed).**
- [REDACTED] Mr. S [REDACTED] needs a Cardiology consultation. This is needed to establish whether Mr. S [REDACTED]'s complaints of chest pain and shortness of breath are caused by underlying cardiac disease. He should be discontinued the amlodipine, which may be responsible for many of Mr. [REDACTED]'s bothersome symptoms. He will need different medication for his severe hypertension, with close monitoring and medication adjustment to ensure safe blood pressure levels (below 130/80). If additional evaluation may be warranted if Mr. [REDACTED]'s complaints persist despite discontinuing the amlodipine. Finally, he needs complete blood tests to rule out Rheumatoid Arthritis. **(He still reaches out often complaining of cardiac issues as well as difficulty breathing and not being treated and the possibility of long haul COVID with feelings of weakness and confusion.)**
- [REDACTED] He has had three holes in his stomach for multiple months that are leaking and bleeding. He believes he needs to have mesh removed in a surgery. He further states he has filed bp-8, and bp-9. **(He had a surgery but he is not healing correctly. He currently has two holes that have re-opened and continue to leak liquid and puss from his stomach.)**
- [REDACTED]: Mr. [REDACTED] is at Sheridan FDC and describes a filling having fallen out of his tooth. The pain is so excruciating that he is almost to the point of ripping the tooth out himself. His face is swollen and the attorney can tell just in speaking with him that the pain level is extremely high. He is being told that there are no dentists or nurses available. **(He was recently brought in locally for Court but should be returning to Sheridan soon. He still has not received dental assistance)**

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- [REDACTED] Needs to be seen to update medications *(He has continued to reach out complaining that the lump in his testes has not been evaluated and that he suffers from long haul COVID and is not being treated properly.)*
- [REDACTED] Mr. [REDACTED] reports repeatedly asking for mental health treatment and being denied that treatment due to COVID-19 restrictions. Medical records support that this has occurred. Mr. [REDACTED] also reports a suicide attempt via hanging that he reported to medical personnel, that he received a cell side visit, and no follow up. Medical records do not mention this suicide attempt. *(In May, he is complaining of pain in his foot and not knowing why the pain is getting worse.)*
- [REDACTED] Vein popped out of leg and they did nothing about it on January 1, 2022. They took him out on gurney. There is an open hole in his leg now. Scab did not heal. He is worried that he might die because it. Needs to see doctor. *(On May 20, 2022 he called and complained about his swollen legs and inability to bend them)*
- [REDACTED] Needs his dentures that he was fitted for before COVID as all his teeth were pulled. The lump in his teste needs to be checked out to see if it is cancerous. He wrote our office in March, 2022, still complaining that he had not been seen for lump. *(On May 18, 2022, he emailed stating he still does not have dentures after two years.)*
- [REDACTED] Treatment for sleep apnea *(He is also requesting to see a dentist.)*
- [REDACTED] His left shoulder rotator cuff is torn and he is in a lot of pain. He saw medical sometime at the end of May and was told that they won't do anything for him until he is designated and that may take six months.
- [REDACTED] Mr. [REDACTED] needs timely medical care for his papillary thyroid carcinoma. He needs to see the appropriate surgical specialist. The time from initial presentation of symptoms to diagnosis was 2 years, and after diagnosis in April of 2021 there is no indication that by November 2021 he has seen the appropriate surgical specialist. The delays he has experienced so far increase his risk for a more deleterious outcome. His anxiety also appears to have been significantly exacerbated by the delays, and this is itself a potential source of unnecessary suffering. **We do not have updated records to assess whether Mr. [REDACTED] has received any care.**

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- [REDACTED] He was walking back down the stairs with his mattress over his head when his prosthetic leg broke in two and he fell down at least 15 stairs. This occurred on Friday, February 11. He was taken to an emergency room in Salem where they told him he had broken his back in two places, ripped his armpit and dislocated his shoulder. He was given opioids in the ambulance and then when they were going to release him they were going to prescribe him more but he declined because he used to be addicted to opioids and he will be released rather soon so he is afraid he will get addicted again. They've now told him that he will get a new leg- of course, because the other one is fully broken. He requires a new prosthetic and follow up care on his back.
- [REDACTED]
- [REDACTED] Needs dental care. He has extreme carpal tunnel that is not being treated. The doctor won't prescribe him the medication (Neurontin) that he says was taking on the streets for this same problem.
- [REDACTED] He wrote: ". i am 489 lbs.. and 5'10". doing anything is extremely difficult and in a cell that is built for 2 normal sized males is even harder when i am 2x the size of a standard man. i have been struggling with my weight constantly here. no access to recreation. i have been DENIED a heart healthy meal option even though it has been put on my MDS SHEET by medical. food service has refused to accommodate my dietary needs. being force fed cake every morning with no other food option isn't conducive to heart health or weight loss goals. i saw via telehealth phone conference a dietician and was required to keep a food journal and actively participate in a personal exercise regimen in October. I have followed all request by the dietician and was scheduled for a follow up telehealth call for mid- January.....nothing has happened. no medical no anything. the unit hasn't been to medical at all for standard heart monitoring or blood pressure."
- [REDACTED] He has early stages of Parkinson's disease, and was recently taken outside the prison to a neurologist at Willamette Valley Med Center (in early February). He recommended adding another Parkinson's med, but according to inmate, Dr. Grassley, the prison doctor called him in the next day, he refused to honor the specialist's prescription, saying that med "wasn't on the formulary".
- [REDACTED] He fractured or broke his wrist in October of 2021. He has not been seen since he returned from the hospital and it continues to hurt and he is still struggling to use his wrist properly.

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- [REDACTED] He needs physical therapy for his back and neck.
- [REDACTED] Mr. [REDACTED] needs to be provided with the recommended physical therapy to enhance his chances of regaining function in his legs. He also needs to be tested for sleep apnea as he remains at risk of the detrimental effects of this condition. A knee x-ray requested by his rheumatologist had not been performed at the last time records were received. His diabetes is not being properly controlled and needs to be treated by MDs or physician assistants, not pharmacists, nurses or paramedics.
- [REDACTED] Needs EKG and blood pressure checked regularly. He received a copy of his recent Blood work and his eGFR(IDMS) is greater than 60 indicating that he may have Kidney disease. He only has 1 Kidney. He also believes his A1C is 6.2 and the limit for a diabetic is 6.4. In March, 2022, he also complained of needing to see a dentist
- [REDACTED] Mr. [REDACTED] has a medical exemption for a bottom bunk but was recently moved to a top bunk.
- [REDACTED] Needs catscan for knee, has problem with vision and needs to see dentist.
- [REDACTED] Needs to be given meals that conform to his medical dietary restrictions. He has celiac disease and he often skips 3 to 5 meals a week because no food is offered that he can eat.
- [REDACTED] He underwent 9 Brain Operations to insert a Ventriculoperitoneal shunt in order to relieve Hydrocephalus with Aqueductal stenosis. He has serious swelling of his knees that affects his mobility and has fallen several times. He suffers serious pain from the shunt to the point that the Doctors referred him for a Consultation with a Neurologist last year for a possible Shunt revision but postponed it due the BOP lock-down. He has yet to be rescheduled for a Neurology Consultation. It's been over a year since he was supposed to see a Neurologist.
- [REDACTED]: On 10/01/2021, he was taken from FCI Sheridan to the local ER for severe kidney pain. At the hospital, they did a CT-Scan, and found that he has a fairly large kidney stone in his left kidney that was trying to move(I also have several smaller stones in both kidneys). They said there was a very minimal chance that the stone could pass on its own, but that due to his history, it would have to be

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dealt with surgically. When he returned to Sheridan, they said I would NOT be receiving Torodol, and that me seeing a Urologist was NOT a priority. On 10/07/2021, Dr. Ayala-Rubio, Nelson, put him in for a consult with a Urologist. On 10/13/2021, the consult with a Urologist was DISAPPROVED. He would like to see a urologist. In March, 2022, he also called and he is in mental health care level 3 where he is supposed to have mental health services once a week. He states he has not been seen in months. There have been no mental health groups in over a month either.

- [REDACTED] He has been complaining of having breathing problems and feeling chest pain. He says that Sheridan changed his medicine but has not received help.
- [REDACTED] Needs blood work done to manage his HIV. In March, 2022, he also called to request follow up on his wrist. He said he put in copouts. He has not had dental and would request it.
- [REDACTED] Has a huge Hernia that makes him look pregnant. He needs treatment.
- [REDACTED] Has kidney disease, was supposed to have CT scan and PSA test.
- [REDACTED] Needs to be seen/evaluated and treated for possible Heart disease.
- [REDACTED] Needs to see dentist.
- [REDACTED] Complains of blood in stool - thinks he has cancer.
- [REDACTED] Requests COVID vaccine.
- [REDACTED] Has dental pain.
- [REDACTED]: Needs MRI and knee brace.
- [REDACTED] He has pain where his arm was re-attached and has been asking to see the doctor and have an increase in pain medication.

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- [REDACTED] He needs monthly injections to his eyes for macular degeneration.
- [REDACTED] Needs to be seen by dentist re: dentures.
- [REDACTED] Bleeding BMs, needs Grade 4 hemorrhoid surgery needed.
- [REDACTED] Needs mental health treatment and to see doctor for back pain.
- [REDACTED] Needs to be seen by doctor. Believes he has lung issues as he has coughed up blood.
- [REDACTED] Has a rash and a hernia that need to be treated.
- [REDACTED] Has been having chest pains. Needs to see medical to have chest pains addressed.

Sincerely,



Lisa Hay  
Federal Public Defender

LH/jll  
cc: Sheridan Team